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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

Plaintiff,

TRRS MAGNATE LLC d/b/a HYDRA CUP,  
Defendant.

1 Pursuant to Civil Local Rule 141, Plaintiff Trove Brands, LLC (“BlenderBottle”)  
2 respectfully requests to seal Exhibits 7-9 to the Declaration of Jacob Rosenbaum in Support of its  
3 Opposition to Defendant’s Motion to Modify the Scheduling Order and Cross-Motion  
4 (“Rosenbaum Decl.”) and portions of BlenderBottle’s Opposition to Defendant’s Motion to  
5 Modify the Scheduling Order and Cross-Motion (“BlenderBottle’s Cross-Motion”) that directly  
6 quote from Exhibits 7-9.

7 “[T]he courts of this country recognize a general right to inspect and copy public records  
8 and documents, including judicial records and documents.” *Nixon v. Warner Commc’ns, Inc.*,  
9 435 U.S. 589, 597 (1978). However, the public’s “access to judicial records is not absolute.”  
10 *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006). “Every Court has  
11 supervisory power over its own records and files,” and may provide access to documents at its  
12 discretion. *Hagestad v. Tragesser*, 49 F.3d 1430, 1434 (9th Cir. 1995) (citing *Nixon*, 435 U.S. at  
13 598). In the case of dispositive motions, the party seeking to seal the record “must articulate  
14 compelling reasons supported by specific factual findings that outweigh the general history of  
15 access and the public policies favoring disclosure, such as the public interest in understanding the  
16 judicial process.” *Kamakana*, 447 F.3d at 1178–79.

17 BlenderBottle files this motion to seal pursuant to Section 7.2(d) of the parties’ Joint  
18 Stipulated Protective Order, Dkt. 34. On February 14, 2024, BlenderBottle received documents  
19 produced by third-party Jeff Harlan. The documents were not designated by Mr. Harlan.  
20 However, Section 7.2(d) of the Protective Order states that “[a]ll Documents produced by such  
21 third parties shall be treated as though marked ‘CONFIDENTIAL’ for a period of 14 days from  
22 the date of their production, during which period any party may designate as ‘CONFIDENTIAL’  
23 or ‘CONFIDENTIAL – ATTORNEYS EYES ONLY’ pursuant to the terms of the Protective  
24 Order.” As of the date of filing this Request to Seal, neither party has designated the third-party  
25 documents from Mr. Harlan.

26 Exhibits 7-9 to the Rosenbaum Decl. are emails produced by Mr. Harlan on February 14,  
27 2024. BlenderBottle’s Cross-Motion directly quotes from Exhibits 7 – 9.

28 BlenderBottle therefore seeks to file under seal Exhibits 7-9 to the Rosenbaum Decl.

BlenderBottle also seeks to file a redacted copy of its Cross-Motion to redact information quoted from Exhibits 7-9 of the Rosenbaum Decl. A highlighted copy of BlenderBottle's Cross-Motion showing what material it seeks to file under seal is being emailed to the Court, along with Exhibits 7-9.

To the extent neither party designates the documents as CONFIDENTIAL or CONFIDENTIAL – ATTORNEYS EYES ONLY by February 27, 2024, or if the Court denies this Request, BlenderBottle will file Exhibits 7-9 publicly, along with an unredacted copy of BlenderBottle's Cross-Motion.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: February 26, 2024

By: /s/ Jacob R. Rosenbaum

Ali S. Razai  
Sean M. Murray  
Jacob R. Rosenbaum  
Christian D. Boettcher

Counsel for Plaintiff TROVE BRANDS, LLC d/b/a THE  
BLENDERBOTTLE COMPANY

**CERTIFICATE OF SERVICE**

I am a citizen of the United States of America and I am employed in Irvine, California. I am over the age of 18 and not a party to the within action. My business address is 2040 Main Street, Fourteenth Floor, Irvine, California.

On February 26, 2024, I served **PLAINTIFF'S REQUEST TO SEAL** on Defendant TRRS Magnate LLC d/b/a Hydra Cup shown below via CM/ECF:

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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on February 26, 2024, at Irvine, California.

/s/ Estefania Munoz  
Estefania Munoz